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6 Attorneys for Defendant  
7 ANDERSON BONILLA ECHEGOYEN

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ANDERSON BONILLA ECHEGOYEN,

15 Defendant.

Case No. LA CR 18-00876-SJO

**MR. BONILLA'S *EX PARTE***  
**APPLICATION TO MODIFY MR.**  
**BONILLA'S BOND CONDITIONS;**  
**[PROPOSED] ORDER**

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17 Defendant Anderson Bonilla Echegoyen, by and through his attorney of record,  
18 Deputy Federal Public Defender David I. Wasserman, hereby applies *ex parte* to this  
19 Court for an Order permitting Mr. Bonilla to go to the gym to effectively treat his  
20 anxiety.

21 This *ex parte* application is based upon the attached declaration of counsel and  
22 all records before the Court in this case.

23 Respectfully submitted,

24 HILARY POTASHNER  
25 Federal Public Defender

26 DATED: May 17, 2019

By /s/ David I. Wasserman

27 DAVID I. WASERMAN  
28 Deputy Federal Public Defender  
Attorney for Anderson Bonilla Echegoyen

**DECLARATION OF DAVID I. WASSERMAN**

I, David I. Wasserman, hereby state and declare as follows:

1. I am a Deputy Federal Public Defender in the Central District of California appointed to represent defendant Anderson Bonilla Echehoyen in the above-titled action. I make this declaration in support of Mr. Bonilla's *ex parte* application to modify the terms of his pre-trial supervision to permit him to go to the gym as directed by pre-trial services in order to effectively treat his anxiety.

2. On March 26, 2019, the Honorable Suzanne H. Segal set conditions of release for Mr. Bonilla, one of which was that he be "restricted to [his] residence at all times except for medical needs or treatment, attorney visits, court appearances, and employment [and] may receive children, all of which must be preapproved by Supervising Agency." Dkt. 21 at 4.

3. Pre-trial services has interpreted the above-referenced condition as requiring court approval for the instant request.

4. Mr. Bonilla suffers from anxiety. On May 7, 2019, Dr. Jose Guerra indicated that Mr. Bonilla would "greatly benefit from physical activity (going to the gym) for his treatment of anxiety." Ex. A (prescription note from Dr. Jose Guerra).

5. Since the date of his release, Mr. Bonilla has been remained in compliance with the conditions of supervision.

6. Mr. Bonilla respectfully moves this Court to permit him to go to the gym as directed by pre-trial services in order to effectively treat his anxiety.

7. On May 15, 2019, Mr. Bonilla's United States Pre-Trial Services Officer, Erika Pimentel, explained that so long as a doctor's note is provided to Pre-Trial Services, then the Office has no objection to Mr. Bonilla's request.

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1           8.     On May 17, 2019, Assistant United States Attorney Kevin Butler indicated  
2 that the government does not object to the instant request.

3  
4           I declare under penalty of perjury that the foregoing is true and correct to the best  
5 of my knowledge.

6  
7 Dated: May 17, 2019

/s/ David I. Wasserman  
DAVID I. WASSERMAN  
Deputy Federal Public Defenders